

*Branford Conservation and Environment Commission
Branford Town Hall
P.O. Box 150
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June 8, 2022

Colleen D'Alessandro
Regional Administrator
New England Region
Federal Aviation Administration
1200 District Avenue
Burlington, MA 01803-5299
Colleen.dalessandro@faa.gov

Dear Deputy Administrator D'Alessandro,

We are writing to express our concerns about the planned expansion of the Tweed-New Haven Airport ("Tweed") and to request that the Federal Aviation Administration ("FAA") prepare an Environmental Impact Statement ("EIS") as required by the National Environmental Policy Act ("NEPA") for projects that may result in significant environmental repercussions. The Branford Conservation and Environment Commission (the "Commission") is pledged to protect the environmental resources in our town and in adjacent areas that would affect our local environment. We believe that the proposed Tweed expansion will result in serious threats to those resources as outlined below.

An EIS is Required Adequately Measure Tweed's Environmental Impact

An EIS is required because the lesser review offered by an Environmental Assessment ("EA") fails to address the complex issues presented by the proposed project. First, this is a controversial and historic project. Tweed proposes to extend its runway and develop a new terminal area.¹ Expanding the airport has a fifty-year record of litigation and community opposition. A state law preventing the expansion of the runway at Tweed was overturned by a federal court in 2019. But, the decision of a federal court on the legitimacy of state law does not waive the FAA's obligations under NEPA to rigorously assess the project's threat to the local environment. Under Section 102(2)(C) of NEPA, major federal actions that significantly affect the "quality of the

¹ See <https://www.tweedmasterplan.com>.

human environment require the rigor represented by an EIS. Tweed's proposed expansion is a major action within the meaning of NEPA under 40 C.F.R § 1508.1(q)(3)(iv).

We believe that the Tweed expansion will have a major deleterious impact on the following:

1. Inland wetlands from both construction and hydrologic changes due to wetlands reduction and increased impermeable surface. Tweed has identified 22.74 acres of inland wetlands that would be adversely affected by the expansion.²
2. Tidal wetlands from direct development and hydrologic changes. The EIS should include an assessment of the project's impact on areas adjacent to the study areas including the taxiway, which would be required for any runway expansion, as well as the impacts to nearby tidal wetlands. The assessment provided by Tweed does not do this.
3. Stormwater. Tweed is a flood management zone that protects the surrounding communities by acting as a catch basin for stormwater. Fewer wetlands and greater impermeable surface will challenge this scenario and put the surrounding communities at risk of flooding.
4. Local and migratory wildlife. The loss of habitat for migratory birds and the increase in bird strikes will greatly affect migratory birds. The airport borders on the most significant reporting site northeast of Cape May and is deemed important to both scientists and vast numbers of amateur birders.
5. Water quality. Runoff from stormwater and pollutants from Tweed threaten the water quality of both surface water and coastal resources. The history of Tweed reveals a record of noncompliance with water quality permits. Nothing in that history suggests that measures will be taken to address the increase in pollutants from de-icing, greater traffic volumes and intensive land use changes.
6. Greenhouse gas emissions. An increase in the air traffic at Tweed and the resulting additional ground traffic will *increase* CO2 emissions. The Commission supports the *reduction* of CO2 emissions as a crucial step in the effort to reduce global warming.

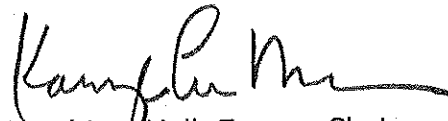
² Even if this number were correct, (there is reason to believe that it is too low), it illustrates the need for an EIS: In 2002, when a prior expansion of Tweed was approved, the FAA did an environmental impact statement when only 9.89 acres of wetlands would be affected. The increased scale of the present proposed expansion should justify an EIS on those grounds alone.

For these reasons, the Branford Conservation and Environment Commission requests that the FAA follow the rules established by NEPA and do the requisite Environmental Impact Statement on Tweed's expansion proposal. The expansion of the airport without rigorous analysis of the project's effects puts the local ecosystem at risk, an outcome that should not be tolerated by the FAA.

The Branford Conservation and Environment Commission

By:  KLS

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